

Member PA & NJ Bar

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August 11, 2023

Honorable Douglas E. Arpert  
*Filed Electronically*

**Re: Paula Burke-Green-Warren v. WFS, Inc., et al.**  
**23-CV-2082**  
**Joint Status Report Regarding Joint Employer Issue**

Dear Judge Arpert:

I am writing to provide the court with a joint status report on behalf of the Parties in the above-captioned matter with regard to the Joint Employer issue as set forth in the Scheduling Order. The Parties have just agreed to a Confidentiality Agreement/Protective Order. Megan R. Calme, Esquire, will be filing a Motion for Protective Order with an attached Confidentiality Agreement agreed to by all the Parties. Upon receipt of signed Protection Order, Defendant will supply information so that the Parties can move forward with determining whether a Joint Employer Stipulation will be entered into.

In addition, counsel for Defendant WFS, Inc., Samuel Dobre, Esquire, has indicated that Defendant WFS is interested in an early settlement conference. The Parties will be reaching out to the Court to schedule this.

Thank you for your attention to this matter.

Very truly yours,

*/s/ William J. Fox*

WILLIAM J. FOX

cc: Samuel Dobre, Esquire  
Megan R. Calme, Esquire